

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

DONNA K. SOUTTER, *for herself and on behalf  
of other similarly situated individuals*

Plaintiff,

Civil Action No. 3:10-cv-107

v.

EQUIFAX INFORMATION SERVICES, LLC

Defendant.

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BRENDA ARNOLD and  
JOYCE RIDGLEY, *on behalf of themselves  
and all other similarly situated individuals*,

Plaintiffs,

Civil Action No. 3:15-cv-460

v.

EQUIFAX INFORMATION  
SERVICES, LLC

**JOINT MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION  
SETTLEMENT AGREEMENT**

Plaintiffs, Donna K. Soutter, Brenda Arnold, and Joyce Ridgley (“Plaintiffs”), on behalf of themselves and all others similarly situated, and Equifax Information Services, LLC (“Defendant”) (collectively the “Parties”) entered into a Class Action Settlement Agreement and Release (“Settlement Agreement” or “Agreement”) attached to the accompanying Memorandum in Support as Ex. 1. Pursuant to Fed. R. Civ. P. 23, the Parties hereby move the Court for Preliminary Approval of the Class Action Settlement Agreement. For the reasons supplied in the accompanying Memorandum in Support, the Parties respectfully request that the court enter a Preliminary Approval Order:

- (1) preliminarily approving a proposed class settlement,
- (2) scheduling a fairness hearing,
- (3) certifying the proposed settlement class for purposes of the proposed class settlement,
- (4) appointing class counsel, and
- (5) approving the form and manner of notice proposed to be sent to all members of the settlement classes.

The Parties have attached as exhibits to the Memorandum in Support of this motion a Stipulation of Settlement, Proposed Preliminary Approval Order and Proposed Class Notice.

Respectfully submitted,  
**PLAINTIFFS,**  
*individually and on behalf of all  
others similarly situated*

By: \_\_\_\_\_/s/  
Of Counsel

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 8th day of December, 2015, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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/s/

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